

DECLARATION OF ROBERT RAINES - AMENDED

SAN DIEGO UNIFIED SCHOOL DISTRICT

RECONSIDERATION OF PRIOR DECISION  
ON:

Education Code Sections 60607, subdivision (a),  
60609, 60615, 60630, 60640, 60641, and 60643,  
as amended by Statutes of 1997, Chapter 828;

Title 5, California Code of Regulations, Sections  
850-874; and

Directed by Statutes 2004, Chapter 895, Section  
19 (Assem. Bill No. 2855),

Effective January 1, 2005.

Case No.: 04-RL-9723-01

*Standardized Testing and Reporting*

DECLARATION OF ROBERT RAINES

HEARING DATE: May 26, 2005

- I, Robert Raines, make the following declaration and statement:
- 1) I am the Program Manager of the Testing Unit, Planning, Assessment, Accountability and Development Division for the San Diego Unified School District (the "District"). Among my responsibilities as Program Manager, I have been named as the District Coordinator for the Standardized Testing and Reporting ("STAR") program and will coordinate the academic skills assessments developed by the State Department of Education.
  - 2) I am familiar with the provisions and requirements of Chapter 828, Statutes of 1997, Education Code sections 60605, 60607, 60609, 60615, 60630, 60640, 60641 and 60643, and Title 5, California Code of Regulations sections 850-874, all relating to the STAR program and the academic skill assessment program.

- 3) I disagree with the Legislative Analyst's Office (LAO) analysis of how extensive the federal testing requirements overlap the state's STAR requirements. The Improving America's Schools Act (IASA) requires certain Title 1 schools to provide student assessment results to parents while the STAR program requires assessment results for all children to be sent to parents.

The LAO's analysis is that the "three IASA-mandated tests constitute about one-third of the state-mandated STAR test" and that "mandated costs should fall by at least that proportion." I disagree with this because the LAO is only considering the number of grades that must be tested (3 for IASA vs. 10 for STAR). The analysis does not take into consideration the number of tests that are required for each grade level.

The federally mandated IASA test of 1994 requires only a standardized test in mathematics and reading/language arts. The state mandated STAR test requires both a California Standards Test (CST) and a California Achievement Test (CAT/6) in Reading/Language Arts and Mathematics, the CAT/6 in spelling, and CSTs in Science, Writing, and History-Social Science. Required tests depend on the student's grade level and are summarized in the table below. An "S" represents a test required by STAR and an "F" represents a test required by the IASA.

<b>Grade Level</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>Totals</b>
<b>CST</b>											<b>By Subject</b>
Language Arts	S	S	S	S	S	S	S	S	S	S	<b>10</b>
Mathematics	S	S	S	S	S	S	S	S	S	S	<b>10</b>
History-Social Studies							S		S	S	<b>3</b>
Science				S				S	S	S	<b>4</b>
Writing Assessment			S			S					<b>2</b>
<b>CAT-6</b>											
Reading/Language	S	S/F	S	S	S/F	S	S	S	S/F	S	<b>10</b>
Spelling	S	S	S	S	S	S	S				<b>7</b>
Mathematics	S	S/F	S	S	S/F	S	S	S	S/F	S	<b>10</b>
Science								S	S	S	<b>3</b>
<b>Total by grade</b>	<b>5</b>	<b>5</b>	<b>6</b>	<b>6</b>	<b>5</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>7</b>	<b>7</b>	<b>59</b>

The data shows that there are a total of fifty-nine grade/subject tests required by the STAR mandate and only six of these tests are federally mandated under the IASA. Therefore, the LAO's estimate of a reduction of about one-third is much too high and is closer to 10 percent (6/59).

- 4) In addition to the tests shown above, the STAR mandate requires that the Spanish Assessment of Basic Education, Second Edition (SABE/2) test be administered to students of limited English proficiency (English Learners). The SABE/2 test includes assessments in Reading, Language, Spelling, and Mathematics for all English Learners in grades 2 through 11. In Spring 2004, approximately 5,000 out of 102,000 (about 5 percent) students were administered the SABE test.
- 5) The federal No Child Left Behind (NCLB) Act of 2002 supersedes the requirements of the IASA and requires more comprehensive testing. The chart

below shows how STAR testing compares with the testing required by NCLB.

An "S" represents a test required by STAR and an "F" represents a test required by the NCLB.

<b>Grade Level</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>Totals</b>
<b>CST</b>											<b>By Subject</b>
Language Arts	S	S	S	S	S	S	S	S	S	S	<b>10</b>
Mathematics	S	S/F	S/F	S/F	S/F	S/F	S/F	S/F	S	S	<b>10</b>
History-Social Studies							S		S	S	<b>3</b>
Science				S				S	S	S	<b>4</b>
Writing Assessment			S			S					<b>2</b>
<b>CAT-6</b>											
Reading/Language	S	S/F	S/F	S/F	S/F	S/F	S/F	S/F	S	S	<b>10</b>
Spelling	S	S	S	S	S	S	S				<b>7</b>
Mathematics	S	S	S	S	S	S	S	S	S	S	<b>10</b>
Science								S	S	S	<b>3</b>
<b>Total by grade</b>	<b>5</b>	<b>5</b>	<b>6</b>	<b>6</b>	<b>5</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>7</b>	<b>7</b>	<b>59</b>

Of the fifty-nine grade/subject tests required by the STAR mandate only fourteen of these test are Federally mandated under NCLB. Therefore, even with the more rigorous testing requirements, the estimate for possible additional offsets to STAR is only twenty-four percent (14/59) starting in 2002. This figure is even less when you consider the SABE requirements of STAR testing.

I declare that the above declaration is made under penalty of perjury and is true and correct to the best of my knowledge, and that such knowledge is based on personal observation, information, or belief.

Date: April 8, 2005

SAN DIEGO UNIFIED SCHOOL DISTRICT

By: 

Robert Raines, Program Manager  
Testing Unit, Planning, Assessment,  
Accountability and Development Division